

Exhibit 11

Allegation Comparison Chart

<u>Trustee Action</u> <i>George Miller v. ANConnect, et al.,</i> Adv. Proc. No. 18-50633 (Bankr. Del.)	<u>This Action</u> <i>EmigrantBank v. SunTrust Bank, et al.,</i> Case No. 20-2391 (S.D.N.Y.)	
Complaint (ECF 1)	First Amended Complaint (ECF 45)	Hearing
Case Filed on June 29, 2018	Case Filed on March 18, 2020	September 20, 2023
¶35 Upon the closing of the September 2014 SunTrust Facility, Calrissian – acting through Mark Perez – caused Alchemy to draw \$14,539,123.65 out of the SunTrust loan proceeds and transfer that \$14,539,123.65 to Calrissian (Alchemy’s sole member) as an equity distribution (the “Calrissian Distribution”).	¶41 On September 4, 2014, upon the closing of the 2014 Credit Agreement, Virgo —acting through Perez— caused Alchemy to draw \$14,539,123.65 from the credit facilities and transfer that sum to Calrissian (the “Virgo Distribution”).	Page 30:10-19 “And one fact that I think has been left out here today is that after those funds became available from the lenders, Virgo caused Alchemy to draw funds from the credit facility, transfer those funds to Calrissian, and then to itself. So it’s created Calrissian as a guarantor and has siphoned funds through Calrissian, while attempting to shield itself from liability for those debts.
¶39 Subsequently, on September 17, 2014, Calrissian made (i) a \$7,110,756.29 transfer to Virgo Onshore, and (ii) a \$7,411,931.38 transfer to Virgo Offshore, totaling \$14,522,687.67. The remaining \$16,435.98 (i.e., the remainder of the Calrissian Distribution, after the September 17, 2014 transfers to Virgo Onshore and Virgo Offshore) remained in Calrissian’s bank account.	¶42 Shortly thereafter, on September 17, 2014, Calrissian paid the money to Virgo in two payments: (i) a \$7,110,756.29 transfer to Virgo Onshore, and (ii) a \$7,411,931.38 transfer to Virgo Offshore, totaling \$14,522,687.67. Calrissian kept only \$16,435.98 (i.e., about one-tenth of one percent of the Virgo Distribution) and Alchemy kept none.	
¶38 The Calrissian Distribution had the effect of doubling Alchemy’s bank debt, from approximately \$15 million, to over \$31 million.	¶43 The Virgo Distribution had the effect of doubling Alchemy’s debt, from approximately \$15 million to over \$31 million	